



United States Attorney
Southern District of New York

United State Courthouse
300 Quarropas Street
White Plains, New York 10601

October 18, 2018

Hon. Cathy Seibel
United States District Judge
300 Quarropas Street
White Plains, NY 10601

Re: United States v. Scronic
18 Cr. 43 (CS)

Dear Judge Seibel:

The Government writes to oppose the defendant's application for permission to travel to Vermont this weekend. The defendant proposes to travel to the Hotel Vermont, which apparently is located in Burlington, VT. Burlington is 45 miles from the Canadian border. The defendant, whom the Court recently sentenced to eight years' imprisonment, has considered flight as an option in the past. He told the FBI when he was arrested that he had considered fleeing once he realized that his scheme was coming to an end but ultimately decided not to do so because it would not set a good example for his son. In addition, the defendant's bond is secured only by the signatures of his parents, neither of whom have the financial resources to pay the bond.

The Pretrial Services officer has advised me that he intends to withdraw his lack of objection based on the proximity of the defendant's proposed destination to Canada, the short notice and the lack of an itinerary or other documentation.

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney

By: /s/
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cc: Alexei Schact, Esq. (by ECF)